



U.S. Department of Justice

Office of the Deputy Attorney General

Washington, D.C. 20530

March 7, 2025

Via ECF

Honorable Dale E. Ho
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Adams, No. 24 Cr. 556 (DEH)

Dear Judge Ho:

The Department of Justice respectfully submits this letter-motion, pursuant to Rule 9(e)(i) of Your Honor's Individual Practices, seeking sealing of Exhibits A – H to the Department's March 7, 2025 Response In Support Of Motion To Dismiss Pursuant To Rule 48(a) (the "Response"). The defendant consents to this request.

In the Response, the Department sought to strike an appropriate balance between the public's right of access, and the privacy interests of the attorneys at issue, by anonymizing the participants to communications. The participants are the subjects of an ongoing investigation at the Department. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006) (explaining that "countervailing factors" against the presumption of access "include but are not limited to . . . and the privacy interests of those resisting disclosure"); *United States v. Dwyer*, 2016 WL 2903271, at *1 (S.D.N.Y. 2016) (reasoning that sealing is warranted to protect, *inter alia*, "the privacy and reputation interests of those involved in an investigation"). Even to the extent inferences regarding the identities of certain participants could be drawn based on connections to public reporting, that is not the case for each of the individual participants. Accordingly, the Department respectfully requests, with the defendant's consent, that Exhibits A – H be maintained under seal.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Emil Bove", written over a horizontal line.

Emil Bove
Principal Associate Deputy Attorney General
United States Department of Justice

Cc: Defense Counsel
(Via ECF)